

EXHIBIT “C”

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE WESTERN DISTRICT OF TENNESSEE

3 DANIEL LOVELACE AND)
4 HELEN LOVELACE,)
5 INDIVIDUALLY AND AS)
6 PARENTS OF BRETT)
7 LOVELACE, DECEASED,)
8)
9)
10)
11)

7 Plaintiffs,)
8 VS.) 2:13-CV-02289-dkv
9)
10)
11)

9 PEDIATRIC)
10 ANESTHESIOLOGIST, P.)
11 A. BABU RAG)
12 PAIDIPALLI, AND MARK)
13 P. CLEMONS,)
14)
15)
16)

Defendants.

14
15 DEPOSITION
16 OF
17 MARK CLEMONS, M.D.
18
19

February 6, 2014

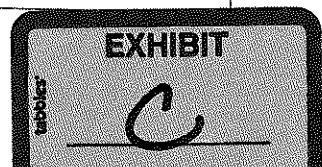
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1 Q. Do you know what a lateral position
2 is?

3 A. On their side.

4 Q. Okay. Is that -- would that have been
5 a proper position for Brett to have been -- been
6 in, is on his side? Would that have been an
7 effective --

8 A. Commonly.

9 MR. GILMER: Object to the
10 form.

11 BY MR. LEDBETTER:

12 Q. Would that have been an effective
13 position for him to have been in?

14 A. On the side would have been a good
15 position.

16 Q. All right. Now, at the time that you
17 departed the PACU after Brett Lovelace's surgery,
18 did you leave any orders for the attending nurse
19 in the PACU to put him in a different position
20 such as a lateral position or a Fowler's
21 position?

22 A. I don't routinely tell the nurse to
23 put them in any particular position. The
24 recovery room has its procedures to get people

1 awake and kids move around, but I had no -- I
2 don't believe I had any orders for any particular
3 position.

4 Q. Now, would you agree that the lateral
5 position, which is also a Sims' position I'll
6 reference, you would have been able to observe
7 whether or not Brett Lovelace's airway was
8 functional -- his upper airway was functional,
9 could you not have?

10 A. What you would better observe is
11 whether he was drooling or bleeding in the
12 lateral position, whether he was breathing or
13 not. I don't know that that would have helped
14 you.

15 Q. Okay. Now, had you left him with
16 orders for supplemental oxygen, that would also
17 have been prudent if no one had, would it not
18 have?

19 MR. JOHNSON: Objection.

20 A. My experience is they roll out of the
21 operating room on oxygen whether I order it or
22 not.

23 BY MR. LEDBETTER:

24 Q. But you did not verify that?